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May 3, 2017

By ECF
The Honorable Steven M. Gold.
United States District Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: EZ Pawn Corp and Aloamaka Onwuakor v. City of New York,et al.
163 CV 3852 (PKC)(SMG)

Your Honor:

I am an Assistant Corporation Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, representing defendants the City of New York and the New York City Police Department ("NYPD") (jointly, the "City") in the above-referenced action brought pursuant to 42 U.S.C. § 1983.

I write to the Court to clarify certain misstatements in opposing counsel's letter that was filed earlier today without prior discussion.

Contrary to opposing counsel's representation that documents relating to Plaintiff's arrest were not produced "until [he] received Defendants Responses on April 27th," the documents were provided on April 25, 2017. As I expressly stated to opposing counsel, the delay was an oversight. See annexed April 25, 2017 letter attached hereto (without enclosures).

As opposing counsel has indicated that there are no discovery disputes that need to be addressed at a conference before the Court on May 8, 2017, this office defers to the Court regarding the need for a conference.

I can confirm that both parties are available for the May 12, 2017 telephone conference, which was scheduled by this Court to discuss the parties' joint Motion for a proposed Protective Order.

Thank you for your consideration herein.

Respectfully submitted,

Yungbi Jang
Assistant Corporation Counsel

Enc.

Cc: Paul Solda, attorney for plaintiffs, by ECF

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April 25, 2017

By E-mail and Regular Mail
Paul J. Solda, Esq.
350 Fifth Avenue, 68th Floor
New York, NY 10118

Re: EZ Pawn Corp and Aloamaka Onwuakor v. City of New York, et al. 16 CV 3852 (PKC)(SMG)

Counselor:

Please find annexed hereto documents relating to Plaintiff's arrest, which through oversight were not provided on April 14, 2017. Had you contacted me at the time, I would have provided them sooner.

The documents annexed hereto are the following:

1. NYPD Police Officer Jonathan Bulzomi ("Officer Bulzomi") memo book for dates July 8, 2015 and July 10, 2015 (Bates Nos. D01-D03);

2. July 10, 2015 Roll call, p. 7, relating to Officer Bulzomi (Bates No. D04);

3. Plaintiff's arrest records (Bates No. D05-D10);

4. Transcript of Plaintiff's court appearances on July 10, 2015, September 24, 2015, November 19, 2015 (Bates No. D11-D22);

5. Certificate of Disposition (Bates No. D23).

Sincerely,

Yungbi Jang
Assistant Corporation Counsel

Enc.